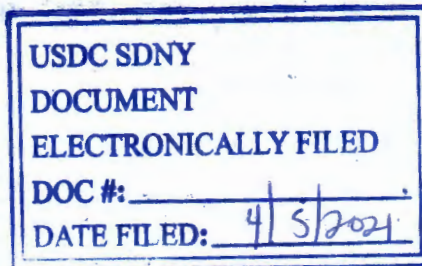




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April 5, 2021

VIA ECF

MEMO ENDORSED

The Honorable Colleen McMahon
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Michael Pappagallo, et al.*, No. 19-cr-545 (CM)

Dear Chief Judge McMahon:

On behalf of defendant Michael Pappagallo in the above-captioned case, I write to respectfully request that the Court lift Mr. Pappagallo's pretrial bail conditions and, pursuant to Federal Rule of Criminal Procedure 46(g), exonerate the bond posted in light of the Court's entry of an order of *nolle prosequi* as to Mr. Pappagallo (ECF No. 92).

On August 1, 2019, the Court granted Mr. Pappagallo bail pending trial subject to the following conditions: (1) \$1,000,000 personal recognizance bond, co-signed by one financially responsible person, and secured by Mr. Pappagallo's Connecticut home; (2) supervision (reporting) at the discretion of the Probation Department; (3) domestic travel only; (4) surrender of all passports (including any temporary or expired passports) and make no new applications for a passport or other international travel document; and (6) compliance with all of the other standard conditions of pretrial release. *See* ECF No. 7.

On April 1, 2021, the Court entered an order of *nolle prosequi* with respect to the indictment in this action. ECF No. 92.

Accordingly, Mr. Pappagallo respectfully requests that the Court lift his bail conditions and exonerate his posted bond.

Respectfully submitted,

s/Daniel P. Filor

Daniel P. Filor
Gregory W. Kehoe
Robert A. Horowitz
Counsel for Michael Pappagallo